

1 LEON DAYAN (State Bar No. 153162)
2 ABIGAIL V. CARTER*
3 RAMYA RAVINDRAN*
4 LANE M. SHADGETT*
5 J. ALEXANDER ROWELL*
6 **BREDHOFF & KAISER P.L.L.C.**
7 805 Fifteenth Street NW, Suite 1000
8 Washington, DC 20005
9 Telephone: (202) 842-2600
10 Facsimile: (202) 842-1888
11 ldayan@bredhoff.com
12 acarter@bredhoff.com
13 rravindran@bredhoff.com
14 lshadgett@bredhoff.com
15 arowell@bredhoff.com
16 *Application *pro hac vice* forthcoming

17 Daniel Feinberg, SBN 135983
18 Catha Worthman, SBN 230399
19 Anne Weis, SBN 336480
20 **FEINBERG, JACKSON, WORTHMANN & WASOW, LLP**
21 2030 Addison Street, Suite 500
22 Berkeley, CA 94704
23 Tel. (510) 269-7998
24 Fax (510) 269-7994
25 dan@feinbergjackson.com
26 catha@feinbergjackson.com
27 anne@feinbergjackson.com

28 *Attorneys for Plaintiffs*

17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**
19 **SAN FRANCISCO DIVISION**

20 AMERICAN FEDERATION OF
21 GOVERNMENT EMPLOYEES, AFL-CIO, et
22 al.,

23 Plaintiffs,

24 v.

25 DONALD J. TRUMP, in his official capacity as
26 President of the United States, et al.,

27 Defendants.

28 Case No.: 3:25-cv-03070-JD

DECLARATION OF YOLANDA JACOBS

DECLARATION OF YOLANDA JACOBS

I, Yolanda Jacobs, declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. I am a Health Communications Specialist at the Centers for Disease Control and Prevention (“CDC”), in the Department of Health and Human Services. I have worked for CDC since 2004. In my role, I work with scientists and policymakers to translate scientific health information to ensure it is accessible to the American public.

3. I am the President of the American Federation of Government Employees Local 2883 ("Local 2883" or the "Union"). I have been a member of the bargaining unit since 2008 and have been involved in Union leadership for 4 years.

4. Local 2883 currently represents a bargaining unit of nearly 2,000 civil servants who work for CDC, and the Federal Labor Relations Authority recently approved adding more than 2,000 new CDC employees to the bargaining unit. It is the largest local at the CDC. Local 2883 employees include Public Health Analysts, Electronics Technicians, Public Health Advisors, Protocol Specialists, IT Specialists, Health Communications Specialists, Biologists, and Epidemiologists. Local 2883 members work at Atlanta-based CDC campuses, Miami Port Health Station, and Washington, D.C. These bargaining unit members monitor disease emergence and patterns, devise public health protocol, manage and evaluate public health programs, and work collaboratively among disciplines to share public health information in a way any person can understand. The employees we represent do not perform national security functions. Despite that, it appears that the March 27, 2025 Executive Order titled "Exclusions from Federal Labor Management Relations Programs" ("Executive Order") covers all of the workers in Local 2883's bargaining unit.

5. Local 2883's mission is to advocate for and promote the interests of bargaining unit members in their federal employment, including working for a safe and fair workplace for all CDC members. As the exclusive bargaining representative of these workers, the Union

1 provides many services to all bargaining unit members. Core functions of the Union include
2 collective bargaining with the agency to obtain a fair and reasonable collective bargaining
3 agreement ("CBA"); filing and negotiating grievances against the agency to enforce the terms
4 and conditions of the CBA; pursuing arbitrations on behalf of workers to enforce the CBA; and
5 providing other support, guidance, and resources to bargaining unit employees. Local 2883
6 strives to resolve labor-management conflicts at the lowest possible level. This de-escalation
7 practice helps members avoid pursuing prolonged and costly litigation whenever possible,
8 resulting in savings for CDC and the American taxpayers. In the past, CDC has consulted with
9 Local 2883 on policy proposals. There have been occasions where Local 2883's proposals were
10 so well received that they were implemented agency wide.

11 6. The Executive Order will have an immediate and severe adverse effect on the
12 Union's ability to provide these services to unit members and to accomplish its mission.

13 7. If the Union is no longer the exclusive bargaining representative of the unit, the
14 Union cannot enforce the CBA against the agency. The CBA provides important rights and
15 protections to workers. For instance, the CBA:

- 16 a. Sets terms and conditions for working hours, overtime, sick leave, holidays, and
paid time off for workers in the unit.
- 17 b. Imposes safety and health requirements to ensure the welfare of workers in their
place of employment.
- 18 c. Establishes protections for workers regarding reduction-in-force ("RIF") actions
and procedures.
- 19 d. Imposes procedures for and limitations on disciplinary and adverse actions against
workers.
- 20 e. Provides for an Employee Assistance Program for individuals who have problems
associated with alcohol, drug, marital, family, legal, financial, stress, attendance,
21 and other personal concerns.

- 1 f. Establishes grievance and arbitration procedures for employees and the Union to
- 2 resolve disputes with the agency over employment matters.
- 3 g. Provides for official time, which allows bargaining unit employees to perform
- 4 union representation activities during certain amounts of time the employee
- 5 otherwise would be in duty status, without loss of pay or charge to annual leave.

6 Without the Union to represent them and enforce the CBA, the workers will not have the
7 benefit of those rights and protections going forward. I understand that the CDC is also likely to
8 rescind the CBA under the Executive Order.

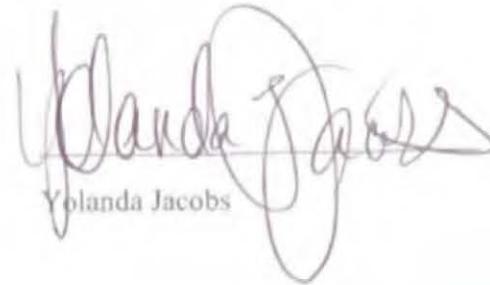
9 8. As a result of the Executive Order, pending grievances and arbitrations to
10 vindicate workers' rights, including under the CBA, will be left unresolved. Local 2883 has
11 three pending grievances. Two grievances concern the return to in-person work and one concerns
12 the termination of probationary employees.

13 9. Official time is essential to my work as President of Local 2883. If Local 2883
14 officers can no longer make use of official time, it will be impossible for the Union to fulfill its
15 representational duties. Since January 20, 2025, I have consistently worked more than sixty
16 hours per week, spending forty on my regular tour of duty and twenty tending to the
17 representational needs of the employees in my unit.

18 10. The Executive Order is chilling workers' speech and activity. I know firsthand
19 that without the protections of the CBA and the Union, workers will be afraid to raise concerns
20 over workplace conditions with the CDC. Local 2883 members have already expressed their
21 fear and uncertainty to me over the administration's targeting of federal unions and their
22 employees. Many workers in this unit are afraid that voicing their concerns may lead to
23 retaliation and further executive action aimed at silencing federal unions.

24 I declare under penalty of perjury under the laws of the United States that the foregoing is
25 true and correct. Executed April 1, 2025, in Atlanta, Georgia.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28



Yolanda Jacobs